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# Skaar & Feagle, LLP

## Invoice

Invoice #	00018
Invoice Date	September 16, 2014
Due Date	September 16, 2014
Balance Due	\$67,472.36
Payment Terms	
Case / Matter	Wreyford, Hayden v. Citizens for Transportation Mobility Inc.

Hayden Wreyford

For services rendered between July 19, 2012 and September 16, 2014

### Time Entries

Date	EE	Activity	Description	Rate	Hours	Line Total
07/19/2012	JH	Drafted Documents for Litigation	Draft Class Action Complaint v. Citizens for Transportation Mobility	225.00	1.4	315.00
07/20/2012	JH	Drafted Documents for Litigation	Discuss matter with KS, draft Summons and Coversheet, Have client execute class authorization document and file.	225.00	0.8	180.00
07/20/2012	JF	Drafted Documents for Litigation	review draft complaint, conf. with cc JTH	375.00	0.6	225.00
07/24/2012	JF	Conference	conf with staff MS regarding service of complaint	375.00	0.1	37.50
08/16/2012	JH	email correspondence	Review and respond to email from Ben Mathis	225.00	0.2	45.00
08/16/2012	JH	review documents	Troutman Sanders filed Answer. Review Answer and Respond to Anthony from Freeman Mathis re: Answer filed.	225.00	0.3	67.50
08/16/2012	JF	email correspondence	rec. email from oc BM, conf. with cc JH regarding extension.	375.00	0.1	37.50
08/16/2012	JF	review documents	reviewed answer filed by CTM by Troutman Sanders, conf. with cc JTH about two firms involvement and conflict of extension request by one firm and answer filed by other.	375.00	0.3	112.50
08/27/2012	JH	Drafted Documents for Litigation	Draft Joint Preliminary Report	225.00	1.3	292.50
08/29/2012	JH	review documents	Reviewing Joint Prelim w/ KS comments; prep for 26(f)	225.00	0.4	90.00
08/29/2012	JH	Conference with opposing counsel	called in and left message; incoming call from A DelRio for 26(f).	225.00	0.4	90.00
09/12/2012	JH	review documents	review Joint Prelim edits by ADR	225.00	0.1	22.50
09/14/2012	JH	review documents	Review Joint Prelim and email back over with finalized dates for filing; draft CIP and Initial Disclosures	225.00	1.1	247.50
09/17/2012	JH	Drafted Documents for Litigation	Draft initial discovery requests to CTM and subpoena to OnTarget	225.00	1.3	292.50

09/18/2012	JH	Electronic Filing	File notice of intent to serve subpoena to OnTarget	225.00	0.1	22.50
09/19/2012	JH	Drafted Documents for Litigation	finalize and send out discovery ; file certificate of service	225.00	0.4	90.00
09/28/2012	JH	Electronic Filing	File Joint Prelim	225.00	0.1	22.50
09/28/2012	JH	Drafted Documents for Litigation	Draft Motion to Add OnTarget and Amended Complaint	225.00	2.2	495.00
09/28/2012	JH	Drafted Documents for Litigation	Motion for extension of time to more for class certification	225.00	1.4	315.00
10/08/2012	JH	Conference with opposing counsel	incoming call from Tony Love - retained to represent OnTarget; requested that we drop the subpeona since we are adding OnTarget. I said we'd drop it in exchange for an extension of time to file a Motion for Class Certification.	225.00	0.1	22.50
10/09/2012	JH	Conference with opposing counsel	Discussed w/ Tony Love the OnTarget subpoena and OnTarget's viability. They will not comply with the subpoena. They want to know whether or not we would withdraw it	225.00	0.2	45.00
10/15/2012	JH	Drafted Documents for Litigation	Researching numerosity issue for M4ClassCert and begin draft of M4ClassCert brief.	225.00	4.2	945.00
10/16/2012	JH	Drafted Documents for Litigation	finish rough draft of M4Class Cert Brief	225.00	2.8	630.00
10/18/2012	JH	Drafted Documents for Litigation	Draft affidavit for Wreyford's signature and Draft my affidavit for the Motion for Class Certification.	225.00	1.8	405.00
10/25/2012	JF	Conference with co-counsel	conf. with cc JTH regarding email from oc BG regarding subpoena and motion to add On Target.	375.00	0.2	75.00
10/30/2012	JH	review documents	Review Disc Resp from CTM and send email to Ben Mathis re: production	225.00	0.6	135.00
10/30/2012	JH	Drafted Documents for Litigation	Preparing Disc Responses	225.00	2.9	652.50
11/09/2012	JH	Drafted Documents for Litigation	Draft Subpoena to AT&T Mobility	225.00	0.9	202.50
11/09/2012	JH	Drafted Documents for Litigation	subpoena to neustar	225.00	0.9	202.50
11/09/2012	JH	Drafted Documents for Litigation	Draft Motion to Compel Subpoena Responses from On Target	225.00	2.0	450.00
11/13/2012	JH	review Court Order	Review Order Amending Complaint and Calendar Deadlines	225.00	0.5	112.50
11/13/2012	JH	Drafted Documents for Litigation	Draft initial discovery requests to On Target	225.00	0.4	90.00
11/13/2012	JF	review Court Order	review Court Order, conf. with cc JTH	375.00	0.4	150.00
11/16/2012	JF	review documents	reviewed CTM agreement and insurance policy, conf. with KS and JTH	375.00	0.5	187.50
11/19/2012	JH	Conference with opposing counsel	Received objections from ATT. Called Robert Steiger at ATT to discuss. He will get back to me next week.	225.00	0.2	45.00
11/21/2012	JH	Drafted Documents for Litigation	Research and draft reply to response to M4ClassCert	225.00	3.3	742.50

11/23/2012	JF	review documents	reviewed answer by CTM to amended complaint	375.00	0.3	112.50
11/30/2012	JH	Conference with opposing counsel	conversation w/ Nathan Garroway regarding AT&T subpoena. He will run request #3 and get back to me Tuesday. Request 1 may take more time. Request 2 will have some privacy concerns.	225.00	0.8	180.00
12/05/2012	JH	Drafted Documents for Litigation	new ATT subpoena	225.00	0.4	90.00
12/18/2012	JH	email correspondence	Email from T Love at K&S re: Scheduling conference. Checked w/ KS re: availability. Responded to T Love for availability Friday Dec. 21 at 1pm.	225.00	0.3	67.50
12/19/2012	JH	Conference with opposing counsel	Reviewed email objections from Nathan Garroway from Dec. 18. Called Nathan Garroway to discuss. AT&T has pulled Mr. Wreyford's calls and the originating number was Citizen's for Transportation Mobility's. AT&T is pulling the list for questions 3 & 6 (which are essentially the same). They may or may not be able to provide that list, but can provide us with an affidavit.	225.00	0.3	67.50
12/21/2012	JH	Conference with opposing counsel	Scheduling conference. New scheduling order with discovery extensions. Discussed extending time to supplement our motion for class certification. T Love with send out new proposed Scheduling Order.	225.00	0.3	67.50
01/02/2013	JH	email correspondence	email T Love re: Joint Motion for Amended Scheduling Order.	225.00	0.1	22.50
01/03/2013	JH	email correspondence	Received email from T Love. Should receive Proposed Motion by end of day.	225.00	0.1	22.50
01/03/2013	JH	Conference with opposing counsel	Call N Garroway re: AT&T Subpoena Response.	225.00	0.1	22.50
01/04/2013	JH	review documents	Review AT&T Objections/Response	225.00	0.1	22.50
01/04/2013	JH	Conference with co-counsel	Discuss strategy w/ KS. Will send discovery workout letter to KS.	225.00	0.3	67.50
01/04/2013	JH	email correspondence	Draft and email Discovery workout letter to King & Spalding.	225.00	1.3	292.50
01/07/2013	JH	Conference with opposing counsel	JTH - Return call to T Love. Left message; Incoming call from T Love - Discuss discovery dates and proposed order; multiple incoming calls from T Love brokering deal for proposed order.	225.00	0.3	67.50
01/07/2013	JH	Drafted Documents for Litigation	Supplement to Plaintiff's Motion for Class Certification	225.00	1.2	270.00
01/08/2013	JH	email correspondence	Draft Letter for N Garroway to send by email attachment	225.00	2.5	562.50
01/09/2013	JF	review Court Order	reviewed court Order	375.00	0.1	37.50
01/15/2013	JH	Conference with opposing counsel	Call into N Garroway re: AT&T subpoena. Left message with assistant.	225.00	0.1	22.50
01/15/2013	JH	Conference with opposing counsel	Phone conf. w/ Nathan Garroway. Wanted to understand need. Will followup later this week.	225.00	0.2	45.00

01/22/2013	JH	email correspondence	Call to N. Garroway: No Answer; Email to N Garroway regarding AT&T response	225.00	0.1	22.50
01/23/2013	JF	review documents	reviewed CTM response in opp to MCC	375.00	0.2	75.00
01/28/2013	JH	review documents	Review Disc responses and requests from OnTarget	225.00	0.7	157.50
01/29/2013	JH	review documents	Review proposed protective order from N Garroway. Too broad. Draft specific order. Send to KS for review.	225.00	1.9	427.50
01/31/2013	JH	Drafted Documents for Litigation	Create subpoena for Robocent.com and send to KS for review.	225.00	1.5	337.50
01/31/2013	JH	Drafted Documents for Litigation	Begin Draft of Reply Brief	225.00	0.6	135.00
02/01/2013	JH	Drafted Documents for Litigation	finish rough draft or reply brief	225.00	2.8	630.00
02/01/2013	JH	Drafted Documents for Litigation	Draft correspondence to send with subpoena.	225.00	0.6	135.00
02/06/2013	JH	Drafted Documents for Litigation	Finalize Reply to Class Cert Motion	225.00	1.0	225.00
02/07/2013	JH	Drafted Documents for Litigation	Drafted initial draft of OnTarget Discovery Responses	225.00	4.5	1012.50
02/12/2013	JH	Conference with co-counsel	Received call from T Love re: Reply Brief. He is upset with the reference to their failure to timely file a response. I told him I would get back to him.	225.00	0.2	45.00
02/12/2013	JH	email correspondence	Discuss call from T Love with Kris Skaar. Wrote email to T Love regarding a proposed resolution of their failure file a timely response.	225.00	0.4	90.00
02/19/2013	JH	Drafted Documents for Litigation	finalize discovery responses for client input and review	225.00	0.7	157.50
02/20/2013	JH	email correspondence	Email from Client re: Disc responses to OnTarget. Concerns over producing his statement. Respond to email. Advise to produce July, 2012 statement.	225.00	0.2	45.00
02/20/2013	JH	Conference with client	Call-in from client to review discovery responses to OnTarget. Client wanted to correct a few errors (typography). Resent for verification. Agreed to produce AT&T Statement.	225.00	0.3	67.50
02/20/2013	JH	Electronic Filing	File Joint Motion for Protective Order	225.00	0.1	22.50
02/22/2013	JH	email correspondence	Email protective order to N Garroway	225.00	0.1	22.50
02/22/2013	JH	review documents	Review Robocent subpoena responses	225.00	0.8	180.00
02/25/2013	JH	Drafted Documents for Litigation	re-work draft discovery responses to On Target in light of new information provided by Robocent.	225.00	1.9	427.50
02/26/2013	JH	Conference with opposing counsel	Received telephone call from Tony Love re: Motion for Telephonic Conference (after motion was filed). Read motion. No objection to conference, but do object to the facts as presented.	225.00	0.2	45.00
02/27/2013	JH	email correspondence	Emailing Responses to OnTarget Discovery Requests to Opp Counsel; file Cert Servs.	225.00	0.8	180.00

03/05/2013	JH	Conference with opposing counsel	Call from N Garroway. Should receive the information today.	225.00	0.1	22.50
03/06/2013	JH	review documents	Reviewed AT&T list. Copied list over to Excel, and removed the 1 before each number for comparison. The call list contained no duplicates, which confirmed that AT&T had inadvertently deleted duplicate calls to the same numbers. Sorted and compared Robocent lists from July 18 and July 21 call reports. The lists are identical. Cross-referenced Robocent and AT&T telephone lists.	225.00	6.1	1372.50
03/07/2013	JH	review documents	Review revised Anderson Declaration. Compare with records from Robocent. 1508 class members.	225.00	3.2	720.00
03/07/2013	JH	Drafted Documents for Litigation	Draft Amended Motion for Class Cert	225.00	4.7	1057.50
03/07/2013	JF	review documents	reviewed docs. email to JTH with go by form for motion under seal	375.00	0.4	150.00
03/08/2013	JH	Drafted Documents for Litigation	Motion to File Under Seal	225.00	1.1	247.50
03/08/2013	JH	Drafted Documents for Litigation	Finalize and file Amended Motion for Class Cert.	225.00	2.2	495.00
03/11/2013	JH	Drafted Documents for Litigation	First Amended Initial Disclosures	225.00	1.6	360.00
03/12/2013	JH	reviewed correspondence	Draft settlement letter	225.00	0.7	157.50
03/13/2013	JH	Drafted Documents for Litigation	Response to Motion for Telephone Conference.	225.00	0.4	90.00
03/18/2013	JH	Drafted Documents for Litigation	begin Draft of Response to Motion for Judgment on the Pleadings	225.00	2.7	607.50
03/19/2013	JH	Drafted Documents for Litigation	Continue Briefing on Resp 2 Mot 4 Judgment on Pleadings	225.00	4.8	1080.00
03/20/2013	JH	Drafted Documents for Litigation	Continue Draft of Resp to M4JOP	225.00	5.1	1147.50
03/21/2013	JH	Drafted Documents for Litigation	Finish initial draft of Motion Response	225.00	2.8	630.00
03/21/2013	JF	Drafted Documents for Litigation	Reviewed draft of response to Motion for Judgement on Pleading. Conf. with cc JTH.	345.00	0.4	138.00
03/22/2013	JH	Conference with opposing counsel	Call in from B Goheen and T Love. Agree to extension of time on Discovery and Resp to Class Cert Motion for the purposes of holding a Scheduling Conference. Asked them to provide insurance and settlement proposal.	225.00	0.4	90.00
03/26/2013	JH	email correspondence	Review and respond to email from T Love re: extensions	225.00	0.2	45.00
03/27/2013	JH	Conference with opposing counsel	Call from B Goheen re: Class Cert deadline. Wants to move to May 23. Confer with KS. Approved. Send email response back.	225.00	0.3	67.50
03/28/2013	JH	review documents	Review OnTarget Insurance Policy. It has TCPA specific exclusion.	225.00	0.6	135.00
03/28/2013	JH	Conference with client	Call client. Make Demand \$900,000.00 and send out. Approved.	225.00	0.2	45.00

03/28/2013	JH	Conference with opposing counsel	Send out Settlement Letter	225.00	0.1	22.50
04/08/2013	JH	review documents	Review CTM's Reply to its Motion for Judgment on the Pleadings.	225.00	0.3	67.50
04/08/2013	JF	review documents	reviewed reply by CTM on MJP, conf. with cc JTH	375.00	0.3	112.50
04/09/2013	JH	review documents	Review CTM's Motion to Stay	225.00	0.2	45.00
04/11/2013	JH	email correspondence	Review Email from B Goheen re: OnTarget's alleged lack of resources.	225.00	0.1	22.50
04/12/2013	JH	reviewed correspondence	Reviewed letter from B Mathis to Eric Holder	225.00	0.1	22.50
04/16/2013	JH	Email communication with opposing counsel	Draft email response to B Goheen in response to his assertions that OnTarget lacks funds. Need at least injunctive relief and need to be convinced that they lack funds. Discussed with KS before sending out.	225.00	0.6	135.00
04/16/2013	JH	Email communication with opposing counsel	Review Email from B Goheen that OnTarget will consider an injunctive relief settlement.	225.00	0.1	22.50
04/17/2013	JH	Email communication with opposing counsel	Discuss with JMF and KS what we need to be convinced that OnTarget is not capable of funding a class-wide settlement. Send email response to B Goheen.	225.00	0.4	90.00
04/23/2013	JH	Drafted Documents for Litigation	Resp 2 Mot 2 Stay	225.00	4.2	945.00
04/30/2013	JH	Conference with opposing counsel	Draft letter to opposing counsel	225.00	1.6	360.00
05/01/2013	JH	Telephone Conference with opposing attorney	Called Barry Goheen re: OnTarget. Will be sending a response to CTM's settlement proposal, but wanted to let them know that we are still open to settling for injunctive relief with OnTarget if they show us that a class-wide damages settlement is not feasible.	225.00	0.1	22.50
05/02/2013	JH	Telephone Conference with opposing attorney	Discussed OnTarget finances for a possible resolution with OnTarget.	225.00	0.2	45.00
05/06/2013	JH	Conference with opposing counsel	Telephone call from M. Foree re: mediation. I asked for a class-wide settlement offer.	225.00	0.1	22.50
05/06/2013	JH	Conference with client	Discuss phone call from CTM, the mediation process, and what we are looking for.	225.00	0.4	90.00
05/07/2013	JH	review documents	Review Notice of Acknowledgement by USA	225.00	0.2	45.00
05/09/2013	JH	Email communication with opposing counsel	Email M Foree regarding possible class settlement offer	225.00	0.1	22.50
05/10/2013	JH	Conference with opposing counsel	Received call from M Foree. They will make class settlement offer. We will mediate. Send B Goheen email to confirm. Need to draft motion to refer to Magistrate.	225.00	0.3	67.50
05/10/2013	JH	review documents	Review CTM's subpoenas	225.00	0.3	67.50
05/13/2013	JH	Drafted Documents for Litigation	Draft Motion to Refer to Magistrate for Mediation and to Stay Pending Mediation	225.00	1.3	292.50

05/16/2013	JH	review Court Order	Review order staying case	225.00	0.3	67.50
05/21/2013	JH	Email communication with opposing counsel	Review Email Correspondence from B Mathis. They are not going to make a class offer in light of the stay. Discuss with KS.	225.00	0.2	45.00
05/28/2013	JH	email correspondence	Email from TargetSmart Counsel regarding subpoena compliance. Forward to KS and JMF. Discuss briefly with KS.	225.00	0.2	45.00
05/29/2013	JH	Conference with opposing counsel	Review email from B Goheen. Forward to JMF and KS.	225.00	0.2	45.00
05/29/2013	JF	Conference with co-counsel	email from and conference with JTH and KS regarding	375.00	0.5	187.50
05/31/2013	JH	Conference with co-counsel	Discuss OnTarget 23(b)(2) proposal with JMF	225.00	0.4	90.00
05/31/2013	JH	Conference with client	Discuss with client settlement with On Target only	225.00	0.7	157.50
05/31/2013	JH	Email communication with opposing counsel	Email proposed settlement layout to B Goheen	225.00	0.8	180.00
05/31/2013	JF	email correspondence	conf. with and reviewed email demand prepared by JTH to oc BG for Ontarget	375.00	0.2	75.00
06/06/2013	JH	review documents	Review USA Notice of Intervention and Memorandum of Law	225.00	0.6	135.00
06/19/2013	JH	Email communication with opposing counsel	Email response from B Goheen regarding OnTarget Settlement	225.00	0.3	67.50
06/20/2013	JH	email correspondence	email correspondence with Client re: OnTarget settlement offer. Client is sick and will get back to me.	225.00	0.3	67.50
06/21/2013	JH	email correspondence	email response to H Wreyford re: proposed settlement with OnTarget	225.00	0.3	67.50
06/24/2013	JH	Conference with client	Phone call from client. Counter OnTarget at 3K and 15k.	225.00	0.2	45.00
07/15/2013	JH	email correspondence	Draft Email response to B Goheen	225.00	0.7	157.50
07/22/2013	JH	Telephone Conference with opposing attorney	Call from M Foree re: request for oral argument on M4JOP. I told him we would not join in the motion but that we would not oppose it.	225.00	0.1	22.50
07/25/2013	JH	Email communication with opposing counsel	Email from B Mathis re: mediation request. Responded by reiterating our earlier position that we would like to mediate, but request an offer prior to mediation.	225.00	0.6	135.00
07/25/2013	JF	email correspondence	received email from oc BM regarding mediation, conf. with cc JTH on response	375.00	0.3	112.50
07/26/2013	JH	Telephone Conference with opposing attorney	Call from M Foree regarding Motion for Oral Argument. I asked him to email it to me for approval. Received email and responded that we have no opposition.	225.00	0.6	135.00
08/02/2013	KS	review Court Order	receive and review order on motion for judgment on the pleadings (1st amendment issue)	375.00	0.5	187.50
08/02/2013	JH	review Court Order	Review Order denying Motion for Judgment on the Pleadings	225.00	0.4	90.00
08/02/2013	JH	email correspondence	Email from B Goheen re: possible settlement with OnTarget. Will speak later.	225.00	0.1	22.50

08/02/2013	JH	Conference with co-counsel	Discuss with JMF and KS Order and offer from B Goheen. Will counter at 12.5k for fees.	225.00	0.1	22.50
08/02/2013	JH	Conference with client	Email correspondence with H Wreyford re: Court Order and offer from B Goheen. Call in from H Wreyford. We are good on everything so long as the injunction goes through the 2016 election.	225.00	0.3	67.50
08/02/2013	JH	Conference with opposing counsel	Phone call w/ B Goheen. Injunction through Dec. 31, 2016 agreed to. He will recommend \$12,500.00 in fees.	225.00	0.1	22.50
08/05/2013	JH	email correspondence	Email correspondence w/ T Love re: proposed settlement agreement	225.00	0.1	22.50
08/05/2013	JF	email correspondence	multiple emails to JTH regarding MSJ and mediation	375.00	0.2	75.00
08/09/2013	KS	Drafted Documents for Litigation	revise "notice of settlement" with On Target	375.00	0.3	112.50
08/12/2013	JH	Miscellaneous Litigation Activity	Received CM/ECF copy of deposition notice for depo on Wednesday. Discussed with KS. Began email discussion with H Wreyford re: availability on short notice. We decided that we may as well do it on short notice, but that he is not available Wednesday. Offer tomorrow or Thursday. Send email to M Foree. Called M Foree. Agreed to Thursday depo.	225.00	1.2	270.00
08/14/2013	JH	Conference with client	Telephone conference with H Wreyford re: deposition	225.00	0.5	112.50
08/15/2013	JH	Miscellaneous Litigation Activity	Wreyford Depo	225.00	2.0	450.00
08/15/2013	JH	review documents	Review CTM subpoena to AT&T and Motion for Certification for Interlocutory Appeal	225.00	0.7	157.50
08/16/2013	JH	review documents	Review CTM Resp to Motion for Class Cert. They really only raised 2 objections: Charged for the call and consent.	225.00	0.6	135.00
08/20/2013	JH	Conference with co-counsel	Email from B Goheen re: settlement proposal. Draft response - Send to JMF and KS to review before sending	225.00	0.3	67.50
08/20/2013	JH	Drafted Documents for Litigation	Beginning Reply to Resp to Amended Motion for Class Cert	225.00	1.6	360.00
08/21/2013	JH	Research legal issue(s)	Trip to Cobb Law Library to pull prior express consent cases on Class Cert and Aff Defense	225.00	1.8	405.00
08/21/2013	JF	email correspondence	emails to and from cc JTH regarding notice and costs.	375.00	0.1	37.50
08/22/2013	JH	Drafted Documents for Litigation	Draft Resp to Motion for Clarification	225.00	0.4	90.00
08/23/2013	JH	Drafted Documents for Litigation	Continuing drafty of reply to response to motion for class cert	225.00	3.2	720.00
08/26/2013	JH	Drafted Documents for Litigation	finishing first draft of reply to response to motion for class cert. Give to KS for review.	225.00	3.2	720.00



08/29/2013	KS	Drafted Documents for Litigation	review, revise and edit response to request for interlocutory appeal; receive and review US Attorney's response to request for interlocutory appeal	375.00	1.2	450.00
08/29/2013	JH	Drafted Documents for Litigation	Finalize Reply to Class Cert Motion and file	225.00	0.8	180.00
08/29/2013	JH	Drafted Documents for Litigation	Draft Response in Opposition to CTM's Motion for Interlocutory Review and send to KS for Review.	225.00	1.7	382.50
08/29/2013	JH	review documents	Review USA Response to CTM's Motion for Interlocutory Appeal	225.00	0.3	67.50
08/29/2013	JF	review documents	reviewed, edited and commented on Reply Brief on motion for stay/clarification	375.00	0.4	150.00
08/29/2013	JF	review documents	reviewed response by oc On target, email to cc JTH	375.00	0.3	112.50
09/09/2013	JH	review documents	Review CTM depo notice to OnTarget	225.00	0.2	45.00
09/10/2013	JH	email correspondence	Email FCDR and AJC regarding publication notice prices and N Garroway regarding obtaining addresses for class members.	225.00	0.2	45.00
09/10/2013	JH	Drafted Documents for Litigation	Rough Draft of Initial Settlement Docs with OnTarget	225.00	4.2	945.00
09/10/2013	JH	Email communication with opposing counsel	Trade emails w/ B Goheen re: OnTarget Settlement Docs and CTM's Depo Notice. B Goheen represents that depo will not happen Friday.	225.00	0.2	45.00
09/10/2013	JF	Drafted Documents for Litigation	preparation of culled down On target proposed class notice. Emails to cc JTH	375.00	0.7	262.50
09/11/2013	KS	Drafted Documents for Litigation	review joint motion re: settlement with OnTarget and accompanying documents	375.00	1.1	412.50
09/11/2013	JH	Drafted Documents for Litigation	Finalize OnTarget Settlement Docs to send to B Goheen after KS and JMF Reviews. Email to B Goheen.	225.00	2.3	517.50
09/11/2013	JF	Drafted Documents for Litigation	Review and edits to class settlement docs, email to cc JTH.	375.00	1.1	412.50
09/12/2013	JH	Email communication with opposing counsel	email correspondence w/ B Goheen. Set up appointment for tomorrow at 3.	225.00	0.1	22.50
09/12/2013	JH	email correspondence	Email correspondence w/ N Garroway re: AT&T. Will discuss with them tomorrow. Will call me back tomorrow.	225.00	0.1	22.50
09/12/2013	JH	Email communication with opposing counsel	Email correspondence with M Foree confirming that OnTarget depo is off for tomorrow and the scheduling order.	225.00	0.1	22.50
09/13/2013	JH	Telephone Conference with opposing attorney	Telephone conference with Barry Goheen re: Settlement Docs, why we won't agree to a release, and why we want notice.	225.00	0.3	67.50
09/16/2013	JH	review Court Order	Review Order Extending Discovery until Sept 30. Recalendar.	225.00	0.1	22.50
09/17/2013	JH	Drafted Documents for Litigation	Drafting Response/Objections to CTM Second Disc. Req. Call B Goheen regarding whether he wants us to produce the Agreement.	225.00	0.4	90.00

09/18/2013	KS	Conference with co-counsel	cw/ atty JH re: renewing settlement offer and wording of email renewing offer; cw/ atty JH re: appellate strategy based on pending motion to appeal 1st amendment issue and possible FRCP 23 immediate appeal, mediation strategy in Kinnard Mediation Center and possible earlier mediation	375.00	0.5	187.50
09/18/2013	JH	Correspondence	Email N Garroway as a followup. Will Speak tomorrow.	225.00	0.1	22.50
09/18/2013	JH	Email communication with opposing counsel	Email settlement demand to CTM. Advised them that the offer may not remain within the policy limits in the event class certification is granted.	225.00	0.3	67.50
09/26/2013	KS	review Court Order	review and review court order denying motion for immediate appeal of 1st amendment issue	375.00	0.2	75.00
09/26/2013	KS	Telephone conversation	tcw/ atty JH re: conclusion of deposition and order denying immediate appeal	375.00	0.1	37.50
09/26/2013	JH	Travel to and/or from court appearance or scheduled meeting	Travel to and from Depo and participating in Depo of M Klein/OnTarget	225.00	2.8	630.00
09/26/2013	JF	review Court Order	reviewed Judge's Order denying CTM motion, email to cc JTH and KS	375.00	0.3	112.50
09/27/2013	JH	Email communication with opposing counsel	Email from B Gogeen re: Ontarget Settlement docs; review changes	225.00	0.3	67.50
09/27/2013	JH	Conference with opposing counsel	Telephone conference w/ B Goheen re: Settlement documents. Worked out changes	225.00	0.4	90.00
09/27/2013	JH	Drafted Documents for Litigation	Finalizing settlement docs with OnTarget based on conversation with B Goheen. Send proposed final agreements for approval.	225.00	0.6	135.00
10/01/2013	JH	Email communication with opposing counsel	Sent email to FMG attys re: Settlement Conference	225.00	0.1	22.50
10/02/2013	KS	Drafted Documents for Litigation	review for revision and editing the settlement agreement, preliminary approval order, final approval order, notice and consent motion	375.00	1.1	412.50
10/03/2013	JH	Conference with client	Received executed settlement agreement from B Goheen. Send to H Wreyford for execution. Call H Wreyford to discuss.	225.00	0.3	67.50
10/03/2013	JH	Email communication with opposing counsel	Received email from B Mathis requesting an extension of time to respond to the settlement demand. Send to KS and JMF for thoughts.	225.00	0.1	22.50
10/04/2013	JH	Conference with opposing counsel	Call from M. Foree following up on B Mathis email. Confirmed 2 week extension of time to respond regarding the settlement demand was okay and discussed OnTarget insurance policy. Sent email confirming extension to B Mathis.	225.00	0.2	45.00
10/04/2013	JH	Drafted Documents for Litigation	Sign off on an file OnTarget settlement docs.	225.00	0.3	67.50
10/11/2013	KS	Conference	cw/ atty JH re: response to mediation proposal from Ben Mathis	375.00	0.4	150.00

10/11/2013	JH	Conference with opposing counsel	Call from B Mathis re: Mediation. Says they will make offer at mediation, but can't beforehand. Says it will be substantial offer though. Will talk with KS and HW.	225.00	0.1	22.50
10/11/2013	JH	Conference with co-counsel	Speak with KS and then JMF re: Mediation. We will agree to mediation so long as the class settlement language is in the order.	225.00	0.3	67.50
10/11/2013	JH	Conference with client	Discuss mediation w/ client. He is on board.	225.00	0.2	45.00
10/11/2013	JH	Drafted Documents for Litigation	Draft Mediation Request	225.00	0.3	67.50
10/14/2013	KS	Receive and review litigation documents	initial review of objection to class settlement by one co-defendant; begin research on standing of co-defendant to object	375.00	0.9	337.50
10/14/2013	KS	Research legal issue(s)	research re: standing of CTM to object to	375.00	0.6	225.00
10/14/2013	JH	Email communication with opposing counsel	Email B Mathis re: Mediation request	225.00	0.1	22.50
10/14/2013	JH	Receive and review litigation documents	Reading over and evaluating CTM's Motion for Summary Judgment and Opposition to the Settlement w/ OnTarget. Discuss w/ KS re: CTM standing to object. Ask Kris to focus on objection so I could focus on Summary Judgment. M4SJ does not mention the May 2013 Charvat/Dish Network order/ relies on Mais which is on appeal.	225.00	1.8	405.00
10/15/2013	KS	email correspondence	review proposed conditions for mediation; prepare email to atty JH (cc to JF) about how to respond	375.00	0.5	187.50
10/15/2013	JH	Receive and review litigation documents	Review CTM Motion for Leave to File Supplemental Class Cert brief. Argues we raised new issues in reply and that additional discovery has been obtained re: consent. Bases motion on conclusory affidavit. Also argues the class definition is outcome determinative.	225.00	0.5	112.50
10/15/2013	JH	Email communication with opposing counsel	Email from B Mathis wanting 2 days post mediation to respond to out settlement proposal. Forward to KS for thoughts. Email exchanges b/w KS and myself to discuss.	225.00	0.2	45.00
10/16/2013	KS	email correspondence	review email from atty JH to atty BM re: mediation request; f/u email to atty JH re: same	375.00	0.2	75.00
10/16/2013	JH	Email communication with opposing counsel	Email to B Mathis to clarify request that their counteroffer not result in automatic rejection of our offer.	225.00	0.2	45.00
10/16/2013	JH	Conference with opposing counsel	Telephone call from B Mathis re: mediation and why the carrier needs to give a formal response if we don't settle in mediation. We will give them the 2 days.	225.00	0.1	22.50
10/16/2013	JH	Email communication with opposing counsel	Email from M Foree re: revision to proposed motion. Looks good except we want to postpone motions obligations re: SJ and Class Cert until after mediation. Made changes to Joint Motion for Mediation and sent back to them.	225.00	0.3	67.50

10/17/2013	JH	Drafted Documents for Litigation	Email from M Foree approving Joint Motion to Mediate for filing. Publish to .pdf and file.	225.00	0.2	45.00
10/22/2013	JH	email correspondence	Email correspondence with K Skaar, H Wreyford, B Mathis and C Kirilenko re: scheduling mediation.	225.00	0.2	45.00
10/23/2013	KS	review Court Order	review mediation order; email to atty JH re: mediation statement	375.00	0.3	112.50
10/23/2013	JH	review Court Order	Review mediation order and send to client	225.00	0.2	45.00
10/23/2013	JF	review Court Order	Reviewed order scheduling mediation, email to and from JTH regarding prep of mediation statement	375.00	0.2	75.00
10/28/2013	KS	Drafted Documents for Litigation	draft reply brief in opposition to CTM's objection to settlement with On Target	375.00	2.3	862.50
10/28/2013	JH	Conference with co-counsel	Review and Discuss with KS his draft Reply to CTM's objection to OnTarget Settlement. Propose that we need to add in why the settlement is fair.	225.00	1.2	270.00
10/29/2013	JH	Email communication with opposing counsel	Email correspondence w/ B Goheen regarding Reply to CTM's opposition to settlement	225.00	0.2	45.00
10/30/2013	JH	Drafted Documents for Litigation	Draft a new section B to Reply Brief re: settlement fairness and review/edit/add to Kris' brief.	225.00	2.8	630.00
10/31/2013	KS	Drafted Documents for Litigation	review, revise and edit reply brief in support of certification of OnTarget settlement class	375.00	0.8	300.00
10/31/2013	JH	Drafted Documents for Litigation	Review edits to Reply Brief re: OnTarget settlement with KS. Finalize and file.	225.00	0.4	90.00
11/07/2013	JH	Drafted Documents for Litigation	Work on mediation statement	225.00	3.2	720.00
11/07/2013	JF	review documents	reviewed On Target response to Motion for prelim approval of class action agreement by On Target. Email to cc JTH and KS.	375.00	0.3	112.50
11/08/2013	JH	Drafted Documents for Litigation	Finish first draft of Settlement Statement	225.00	1.4	315.00
11/15/2013	KS	Drafted Documents for Litigation	review, revise and edit mediation statement	375.00	1.0	375.00
11/20/2013	KS	email correspondence	email correspondence re: scheduling time to prep for mediation	375.00	0.1	37.50
12/02/2013	KS	Telephone conversation	tcw/ atty JH, JF; tcw/ atty JH, JF and client Mr. W	375.00	0.9	337.50
12/02/2013	JF	Conference with client	conf. with client and JH and KS regarding prep for Mediation	375.00	1.2	450.00
12/02/2013	JH	Conference with client	conference w/ client and co-counsel re: mediation	225.00	1.2	270.00
12/03/2013	KS	Travel to and/or from court appearance or scheduled meeting	travel to and from mediation in Gainesville	375.00	2.8	1050.00
12/03/2013	KS	Attend mediation	attend mediation conducted by Judge Clay Fuller	375.00	6.5	2437.50
12/03/2013	JH	Attend mediation	Attend mediation	225.00	6.0	1350.00
12/03/2013	JF	Mediation	8:30-5:45 Gainesville Port to port for mediation.	375.00	9.3	3487.50

12/04/2013	KS	Conference	after action review with atty JH	375.00	0.4	150.00
12/04/2013	JH	email correspondence	email N Garroway re: Class Addresses	225.00	0.1	22.50
12/11/2013	JF	Conference	meeting with Matt Bucher of KCC to discuss admin of case and quote	375.00	1.5	562.50
12/11/2013	KS	Conference	conf. with JMF and KCC rep, Matt Bucher regarding admin of class.	375.00	1.5	562.50
12/18/2013	JH	Conference with opposing counsel	Telephone conference w/ N Garroway re: AT&T numbers	225.00	0.3	67.50
12/26/2013	JH	Drafted Documents for Litigation	drafting class settlement agreement	225.00	1.1	247.50
12/27/2013	JH	Drafted Documents for Litigation	finish initial draft of settlement agreement and notice, begin draft of joint motion	225.00	4.2	945.00
12/30/2013	JH	Drafted Documents for Litigation	finalize initial draft of class settlement docs with CTM and send to JMF for review.	225.00	1.2	270.00
12/30/2013	JF	Review Draft Pleading	Review and edit settlement docs with CTM. Conf. with cc KS.	375.00	1.2	450.00
12/31/2013	KS	Drafted Documents for Litigation	review, revise and edit joint motion for prelim approval, settlement agreement, class notice, prelim order and final order	375.00	2.2	825.00
01/07/2014	JF	Receive and review litigation documents	Review of KCC admin proposal, conf. with staff.	375.00	0.3	112.50
01/15/2014	JH	Conference with opposing counsel	Incoming call from N Garroway re: AT&T	225.00	0.1	22.50
01/15/2014	JH	Conference with opposing counsel	Telephone call to M Foree to check status. Email to Ben and Matt Foree as a followup.	225.00	0.1	22.50
01/23/2014	JH	Drafted Documents for Litigation	Draft Motion to Extend Stay and send to M Foree w/ Email	225.00	0.8	180.00
01/23/2014	JF	Conference with co-counsel	conf. with JTH regarding additional extension	375.00	0.1	37.50
01/27/2014	JH	Conference with opposing counsel	Email to M. Foree re: proposed joint extension motion	225.00	0.1	22.50
01/27/2014	JH	Receive and review litigation documents	Email from M. Foree approving Joint Motion. Publish to .pdf and file.	225.00	0.2	45.00
01/27/2014	JH	Correspondence	email to M Foree re: when to expect revisions.	225.00	0.1	22.50
02/03/2014	JH	Conference with opposing counsel	Return call to M Foree. Left message.	225.00	0.1	22.50
02/04/2014	KS	review Court Order	receive and review order on extended motion to stay	375.00	0.1	37.50
02/14/2014	JH	Conference with opposing counsel	Call B Mathis and M Foree re: holdup on getting docs back.	225.00	0.1	22.50
02/14/2014	JH	Email communication with opposing counsel	email M Foree and B Mathis re: holdup	225.00	0.1	22.50
02/14/2014	JF	Conference with co-counsel	conf. with cc JTH regarding case status and need for getting draft of settlement docs back from oc.	375.00	0.2	75.00
02/17/2014	JH	Correspondence	Review draft status report. Send back to M Foree.	225.00	0.1	22.50
02/21/2014	JH	Correspondence	Email to Ben Mathis and Matt Foree re: status of settlement agreement	225.00	0.1	22.50

02/21/2014	JH	Conference with opposing counsel	Call from M Foree. Still waiting to get approval from adjuster.	225.00	0.2	45.00
02/21/2014	JF	review documents	reviewed settlement docs from Matt Foray, email to cc KS and JTH	375.00	0.4	150.00
02/21/2014	JF	review documents	Review and discussion of changes to class settlement docs with JTH.	375.00	0.5	187.50
02/24/2014	JH	Drafted Documents for Litigation	Review Class Settlement Docs w/ M Foree's revisions. Email response to M Foree with no objection. Received call while drafting email to discuss reverter. M Foree requested an email re: why the reverter would not work.	225.00	1.3	292.50
02/24/2014	KS	Research legal issue(s)	research re: local authority on use of cy pres; email same to all counsel	375.00	0.4	150.00
02/24/2014	JF	email correspondence	email regarding opt out and objection language to cc JTH.	375.00	0.3	112.50
02/27/2014	KS	Telephone conversation	multiple tcw/ atty JH & JF re: new development in negotiation of class settlement re: defendant's demand for a kickback	375.00	0.8	300.00
02/27/2014	JH	Correspondence	Phone call from B Mathis re: Reverter. Discuss with JMF and Kris Skaar. Call M Foree back and ask for documents they can approve without the reverter.	225.00	0.9	202.50
03/02/2014	KS	Receive and review litigation documents	review documents relevant to attempts to conclude settlement	375.00	0.2	75.00
03/03/2014	JH	Correspondence	Call M Foree; Send email. Received call back from M Foree to discuss class settlement. I need the executed agreement to get all signatures together. Received email from M Foree with executed agreement. Forward to H Wreyford for signature.	225.00	0.3	67.50
03/03/2014	JH	Drafted Documents for Litigation	Received executed agreement back from H Wreyford. Sign off and mate all docs together for filing.	225.00	1.4	315.00
03/04/2014	JF	email correspondence	email to and from cc JTH regarding firming up cost estimates from KCC before signing off on using them.	375.00	0.2	75.00
03/05/2014	KS	Miscellaneous Litigation Activity	review documents from class administration firm (estimate etc.)	375.00	0.2	75.00
03/11/2014	KS	review Court Order	review order; cw/tcw/ atty JH & JF re: fixing timeline	375.00	0.4	150.00
03/11/2014	JH	review and calendar notice from court	Court ordered fairness hearing in April. Email M Foree re: potential conference call to allow time for notice.	225.00	0.2	45.00
03/11/2014	JH	Conference with opposing counsel	Phone call w/ M Foree re: call to Clerk	225.00	0.2	45.00
03/12/2014	JH	Correspondence	Email correspondence w/ M Foree	225.00	0.1	22.50
03/12/2014	JH	Correspondence	Phone call with Matt Bucher at KCC re: administration	225.00	0.1	22.50
03/12/2014	KS	email correspondence	exchange emails re: status of objection to On Target element of settlement	375.00	0.2	75.00

03/12/2014	JF	Conference with co-counsel	conf. with cc JTH regarding Judge Vining setting fairness hearing prematurely. Discussion on how to respond to court.	375.00	0.3	112.50
03/14/2014	KS	email correspondence	review email re: rescheduling	375.00	0.1	37.50
04/07/2014	JH	Email communication with opposing counsel	Email opposing counsel regarding whether or not to have the case reassigned to a Magistrate.	225.00	0.2	45.00
04/07/2014	JF	Conference with co-counsel	Discussion with JTH regarding approaching oc regarding consenting to jurisdiction of a Magistrate to move case along.	375.00	0.2	75.00
04/25/2014	JH	Correspondence	Case assigned to Judge King. Call courtroom deputy to request email for correspondence so that I may attach opposing counsel. Send email to apprise of case status.	225.00	0.3	67.50
05/05/2014	KS	email correspondence	receive email from court re: scheduling and resolution of pending motions	375.00	0.3	112.50
05/05/2014	JH	email correspondence	Review email from Karen Thornton for Judge King re: submitting new proposed orders.	225.00	0.1	22.50
05/06/2014	KS	email correspondence	review exchange of emails with court re: disposal of all non-class-approval motions	375.00	0.2	75.00
05/06/2014	JH	Drafted Documents for Litigation	Respond to email from K Thornton re: new proposed orders. Edit and circulate proposed orders to defense counsel for approval.	225.00	0.6	135.00
05/07/2014	JH	Drafted Documents for Litigation	Speak w/ M Foree. Draft Order denying pending motions as Moot. Waiting for OnTarget to respond.	225.00	0.3	67.50
05/09/2014	JH	Correspondence	Receive B Goheen edits. Apply and respond with new doc for approval.	225.00	0.2	45.00
05/09/2014	JF	email correspondence	email to oc Tony Love regarding amended approval order	375.00	0.2	75.00
05/12/2014	JH	Conference with opposing counsel	Return Call to M. Foree. Voice mail.	225.00	0.1	22.50
05/12/2014	JH	Conference with opposing counsel	Return call again to M. Foree. Discussed changes to class docs.	225.00	0.1	22.50
05/13/2014	JH	Correspondence	Emails to opposing counsel asking for confirmation of consent to the proposed orders to send to the court. Receive confirmation.	225.00	0.1	22.50
05/13/2014	JH	Correspondence	Email Karen Thornton proposed orders.	225.00	0.2	45.00
05/14/2014	JH	Correspondence	Email from Karen Thornton re: JFK changes to CTM order. Make changes, resend.	225.00	0.3	67.50
05/14/2014	JH	Correspondence	Confirmation from Court that orders are signed. Final Fairness Hearing set for Oct. 16 at 10:00 AM.	225.00	0.1	22.50
05/14/2014	JH	Correspondence	Send email to KCC re: preliminary approval order and class notice. Let them know its time to get started.	225.00	0.2	45.00

05/14/2014	JH	Correspondence	Email correspondence with FCDR re: publication of OnTarget settlement notice. Charge is \$145.00. Call FCDR to make payment.	225.00	0.3	67.50
05/15/2014	KS	review Court Order	receive and review court orders re: preliminary approval of settlement; calculate and calendar significant dates; cw/ atty JH re: necessary activities and filings before hearing date	375.00	0.5	187.50
05/21/2014	KS	Miscellaneous Litigation Activity	revise outgoing class action info line message	375.00	0.2	75.00
07/31/2014	JF	email correspondence	Email to cc JTH to contact Matt at KCC regarding payment to admin logistics.	375.00	0.1	37.50
08/27/2014	JF	Conference with co-counsel	Conf. and emails to cc KS and JTH regarding CAFA notices.	375.00	0.4	150.00
09/10/2014	JH	Drafted Documents for Litigation	Begin Draft of final approval motion	225.00	1.0	225.00
09/15/2014	JH	Drafted Documents for Litigation	Draft first draft of final approval motion.	225.00	4.2	945.00
09/16/2014	JF	Drafted Documents for Litigation	Finalized motion and fee petition, multiple conf. with JTH, reviewed billing records, finalized my declaration.	375.00	2.9	1087.50
09/16/2014	JH	Drafted Documents for Litigation	Draft JMF Decl	275.00	0.8	220.00

Time Entry Total: **\$64,745.50**

## Expenses

Date	EE	Activity	Description	Cost	Quantity	Line Total
07/20/2012	JH	Filing Fee		350.00	1.0	350.00
11/15/2012	JH	Service of Process	Fee to Secretary of State for service on OnTarget pursuant to OCGA 45-13-26(b).	10.00	1.0	10.00
02/04/2013	JH	Service of Process	Check to Marston for Service of Subpoena on Robocent	85.00	1.0	85.00
09/12/2013	JH	Costs for Deposition Transcript	Transcript of Wreyford Deposition	301.80	1.0	301.80
10/11/2013	JH	Costs for Deposition Transcript	Transcript for M Klein Deposition	353.81	1.0	353.81
05/14/2014	JH	Publication Notice	Publication notice in the Fulton County Daily Report re: TSPLOST Class Action.	145.00	1.0	145.00
08/11/2014	JH	Research legal issue(s)	Research costs: Accurint (Lexis-Nexis): Assisting KCC with address lookup.	1481.25	1.0	1481.25

Expense Total: **\$2,726.86**



Time Entry Sub-Total:	64,745.50
Expense Sub-Total:	2,726.86
<b>Sub-Total:</b>	67,472.36
<b>Total:</b>	67,472.36
<b>Amount Paid:</b>	0.00
<b>Balance Due:</b>	<b>\$67,472.36</b>